UNITED STATES BANKRUPTCY COURT
DISTRICT OF MASSACHUSETTS (BOSTON)

IN RE: Richard J. Jenks and Jennifer M. Jenks, Debtor	CHAPTER 13 CASE NO. 16-14704-JNF

OBJECTION TO CONFIRMATION OF THE DEBTOR'S CHAPTER 13 PLAN (DOCKET NO. 34)

Now Comes Citimortgage, Inc. and files its objection to confirmation of the Debtor's Chapter 13 Plan (the "Plan"). In support of its objection, Citimortgage, Inc. states as follows:

1. Citimortgage, Inc. is the holder of the first mortgage on the Debtor's property located at 12 First Street, Norwood, MA 02062 (the "Property").

2. The Mortgage is in default with an approximate pre-petition arrearage of $26,001.67 and approximate principal balance of $210,796.44. By the filing of this Objection to the Debtor's Chapter 13 Plan, Flagstar Bank hereby sets forth its demand for payment and intent to hold the Debtor liable for the debt. The Proof of Claim bar date is May 1, 2017.

3. The Debtor's Plan only provides for $10,445.39 in pre-petition arrearage. Thus, the Debtor's Plan fails to provide for the payment of Citimortgage, Inc.'s pre-petition arrearage.

WHEREFORE, Citimortgage, Inc. respectfully requests that the Court deny confirmation of the Debtor's Chapter 13 Plan or for such other relief as the Court deems just and proper.

Respectfully submitted,
Citimortgage, Inc.,
By its counsel,

/s/Joshua Ryan-Polczinski
Joshua Ryan-Polczinski, Esquire
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Dated: march 1, 2017

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CERTIFICATE OF SERVICE

I, Joshua Ryan-Polczinski, Esquire, state that on March 1, 2017, I electronically filed the foregoing document on behalf of CitiMortgage, Inc. with the United States Bankruptcy Court for the District of Boston using the CM/ECF System. I served the foregoing document on the following CM/ECF participants:

John Fitzgerald, Esquire, Assistant U.S. Trustee
Carolyn Bankowski, Esquire, Chapter 13 Trustee
Ira H. Grolman, Esquire for Debtors
Patrick Michael Groulx, Esquire for Debtors

I certify that I have mailed by first class mail, postage prepaid the documents electronically filed with the Court on the following non CM/ECF participants:

/s/Joshua Ryan-Polczinski
Joshua Ryan-Polczinski, Esquire
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